

NOTICE OF SERVICE OF PROCESS**EXHIBIT B****Transmittal Number: 24603473**

(Click the Transmittal Number to view your SOP)

Pursuant to client instructions, we are forwarding this summary and Notice of Service of Process.

Entity: Columbia Sussex Corporation
Entity I.D. Number: 3120530
Entity Served: Columbia Sussex Corporation d/b/a Myrtle Beach Marriott Resort
Title of Action: Barbara A. Sapienza vs. Columbia Sussex Corporation d/b/a Myrtle Beach Mar
Document(s) type: Summons/Complaint
Nature of Action: Personal Injury
Court/Agency: Horry County Court of Common Pleas, South Carolina
Case/Reference No: 2022-CP-26-01364
Jurisdiction Served: South Carolina
Date Served on CSC: 03/10/2022
Answer or Appearance Due: 30 Days
Originally Served On: CSC
How Served: Certified Mail

Sender Information:

Law Office of Natasha M. Hanna, P.C.
843-839-8002

Primary Contact:

Joe Yung
Columbia Sussex Corporation

Electronic copy provided to:

Tom Drake
Mary Sheanshang

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the document(taking appropriate action.

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NATASHA HANNA
LAW OFFICE

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED - RESTRICTED DELIVERY

March 7, 2022

Corporation Service Company
As Registered Agent for
Columbia Sussex Corporation
508 Meeting Street
West Columbia, SC 29169

RE: Barbara A. Sapienza and Phillip J. Sapienza v. Columbia Sussex Corporation d/b/a
Myrtle Beach Marriott Resort; Civil Action No. 2022-CP-26-01364

Dear Sir or Madame:

Mw firm has been retained to represent Barbara A. Sapienza and Phillip J. Sapienza concerning the accident that occurred on May 26, 2021. Unfortunately, we tried to negotiate a reasonable settlement with your insurance company but were unable to do so. I am sorry for this inconvenience. By law, I have to serve the enclosed Summons and Complaint upon you and allow you thirty days in which to respond. Please forward this lawsuit to your insurance company.

With kind regards, I am

A handwritten signature in black ink, appearing to read 'Mallery W. Hitchcock'. The signature is fluid and cursive, with the first name 'Mallery' being more prominent.

Mallery W. Hitchcock

Enclosures

cc: Melinda Cole, Gallaher Bassett

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY)	CASE NUMBER 2022-CP-26-_____
Barbara A. Sapienza and Phillip J. Sapienza,)	
)	
Plaintiffs,)	
)	
Vs.)	SUMMONS
)	(Jury Trial Demanded)
Columbia Sussex Corporation)	
d/b/a Myrtle Beach Marriott)	
Resort,)	
)	
Defendant.)	
_____)	

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer on the Plaintiffs' attorney, Law Office of Natasha M. Hanna, P.C. at 4712 Jenn Drive, Suite A, Myrtle Beach, South Carolina 29577, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

Dated at Myrtle Beach, South Carolina, on the 4th day of March, 2022.

/s/ Natasha M. Hanna

Natasha M. Hanna, Esq., SC Bar No. 70198
Attorney for the Plaintiff
Law Office of Natasha M. Hanna, P.C.
4712 Jenn Drive, Ste. A
Myrtle Beach, SC 29577
Phone: [843] 839-8002
Fax: [843] 839-8011

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY)	CASE NUMBER 2022-CP-26-_____
Barbara A. Sapienza and Phillip J. Sapienza,)	
)	
Plaintiffs,)	
)	
Vs.)	COMPLAINT
)	(Jury Trial Demanded)
Columbia Sussex Corporation)	
d/b/a Myrtle Beach Marriott)	
Resort,)	
)	
Defendant.)	
_____)	

The Plaintiffs, complaining of the Defendant, would respectfully show this Honorable Court that:

1. The Plaintiffs, Barbara A. Sapienza and Phillip J. Sapienza, are citizens and residents of Lenoardtwn, Maryland.
2. The Defendant, Columbia Sussex Corporation, is, upon information and belief, a corporation organized and existing under and by virtue of the laws of the State of Kentucky and is licensed to do business and engaged in doing business in Horry County, South Carolina.
3. The actions, inactions, and events complained of herein occurred in Horry County, State of South Carolina.
4. This Honorable Court has jurisdiction over this matter.
5. Venue is proper with this Court.
6. That on or about May 26, 2021, the Plaintiff Barbara A. Sapienza and Phillip J. Sapienza were guests or invitees at the Myrtle Beach Marriott Resort, which is owned and/or operated by the Defendant.

7. On that same date, the Plaintiffs were walking back from the beach access on the resort to their rooms.
8. Both Plaintiffs walked into a pool area on the premises in order to return the resort towels.
9. Upon entering the pool area, Plaintiff Barbara A. Sapienza walked on the walkway and slipped and fell on the floor, which caused her significant injury.
10. The walkway was extremely slippery, which caused Mrs. Sapienza to fall.

FOR A FIRST CAUSE OF ACTION:
(Premises Liability)

11. The Paragraphs set forth above are reiterated and realleged as though set forth verbatim.
12. Defendant owned, operated, or leased the above-described Property.
13. Plaintiffs entered the Property for the benefit of Defendant.
14. Defendant owed Plaintiffs a duty to exercise reasonable care for her safety, and this duty included but is not limited to warning the Plaintiffs of hidden, latent, known, or obvious dangers of which the Defendant has knowledge or should have knowledge.
15. Defendant breached this duty as described above.
16. Defendant knew or should have known of the slipper and dangerous floor.
17. As a direct and proximate result of Defendant's negligence, gross negligence, willful and wanton acts and omissions, Plaintiffs suffered actual and consequential damages, which include but are not limited to, pain and suffering, medical bills, and lost wages. Plaintiffs are also entitled to punitive damages.

FOR A SECOND CAUSE OF ACTION
(Negligence)

18. The Paragraphs set forth above are reiterated and realleged as though set forth verbatim.
19. Defendant owed an affirmative duty of care to Plaintiffs because of the above-mentioned

relationship.

20. Defendants breached their duty of care to Plaintiff by failing to warn and/or failing to maintain the walkway.
21. Defendant knew or should have known of the slippery and dangerous floor as they created the condition.
22. That the injuries and damages sustained by the Plaintiffs were due to and caused by, and were the direct and proximate result of one or more of the following acts of negligence, carelessness, recklessness and gross negligence of the Defendant, its agents and servants, as fully alleged below:
 - a. in failing to properly maintain the floor;
 - b. in failing to warn the general public, and particularly this Plaintiff, of the hazards of the floor;
 - c. in failing to exercise that degree of care and caution that an ordinary and prudent person would have exercised under like conditions and circumstances then and there existing;
 - d. in permitting a dangerous hazard to exist on the floor at the Myrtle Beach Marriott Resort when it knew from periodic use and inspection, or through the exercise of reasonable care should have known that the floor was dangerous, defective and in ill repair, thus constituting a hazard;
 - e. in failing to conduct or require routine inspections of the floor when it knew, or through the exercise of reasonable care should have known that it presented a dangerous hazard to the public;
 - f. in failing to have mats on the floor;

- g. in failing to properly repair, clean and maintain the floor; and
- h. in otherwise being careless, negligent and reckless.

FOR A THIRD CAUSE OF ACTION
(Loss of Consortium)

- 23. Plaintiffs incorporate all above paragraphs as if set forth fully hereunder.
- 24. As a direct and proximate result of the negligent, careless, grossly negligent, reckless, willful and wanton acts and omissions of the Defendant in the manners specified above, Plaintiff Barbara A. Sapienza, sustained injuries, which, in turn, caused Plaintiff Phillip J. Sapienza to be deprived of the right of companionship, aid, society and services of his wife.
- 25. As a direct and proximate result, Plaintiffs have been damaged, as set forth fully herein.

WHEREFORE, Plaintiffs pray for judgment against the Defendant for actual and punitive damages, for the costs of this action and for such other and further relief as the court may deem just and proper.

/s Natasha M. Hanna

Natasha M. Hanna, Esq. (SC Bar No. 70198)
Attorney for the Plaintiffs
The Law Office of Natasha M. Hanna, P.C.
4712 Jenn Drive, Ste. A
Myrtle Beach, SC 29577
Phone: [843] 839-8002
Fax: [843] 839-8011

March 4, 2022
Myrtle Beach, South Carolina



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Corporation Service Company
As Registered Agent for
Columbia Sussex Corporation
508 Meeting Street
West Columbia, SC 29169

4712 Jenn Dr., Suite A • Myrtle Beach, SC 29577
nhannalaw.com

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